STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH BUREAU OF HEALTHCARE SYSTEMS

In re: Renee Segnatelli, L.P.N.

Petition No. 2003-1202-011-044

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Renee Segnatelli:

- 1. Renee Segantelli of Derby (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nurse license number 023412.
- 2. At all relevant times, respondent was employed as a licensed practical nurse at Cedar Lane Rehabilitation in Waterbury, Connecticut.
- 3. From approximately August 2003 through October 2003, while working as a licensed practical nurse at Cedar Lane Rehabilitation, respondent:
 - a. diverted Oxycodone and Percocet;
 - b. failed to completely, properly and/or accurately document medical or hospital records; and/or,
 - c. falsified one or more Controlled Substance Receipt Records.
- 4. In or about August 2003 to October 2003, respondent abused or utilized to excess Oxycodone and/or Percocet.
- 5. Respondent's abuse of Oxycodone and/or Percocet does, and/or may, affect her practice as a licensed practical nurse.
- 6. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b), including but not limited to:
 - a. §20-99(b)(2);
 - b. $\S 20-99(b)(5)$; and/or
 - c. §20-99(b)(6).

THEREFORE, the Department prays that:

The Connecticut Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Renee Segnatelli as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this ______ day of _______ an uary _____ 2004.

Marianne dom Marianne Horn, Director

Division of Health Systems Regulation

Bureau of Healthcare Systems

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